

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA

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vs.

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CASE NO.: 2:05-CR-119-F

**DON EUGENE SIEGELMAN,
PAUL MICHAEL HAMRICK,
GARY MACK ROBERTS and
RICHARD M. SCRUSHY.**

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**MOTION FOR EXTENSION OF TIME IN WHICH
TO FILE PRETRIAL MOTIONS**

Defendant, Paul Michael Hamrick, by and through undersigned counsel, moves this Court to grant additional time for the filing of pretrial motions and as grounds would show as follows:

1. In December, 2005, the federal grand jury for the United States District Court for the Northern District of Alabama, Middle Division returned an indictment against Defendant which charged him in numerous counts of a thirty-four count indictment. Amongst the charges against defendant are complex allegations of RICO conspiracy, Honest Services Fraud, Extortion, Money Laundering, and Obstruction of Justice.
2. At arraignment, defendant was represented by Ron Wise, Esq., an attorney at law in Montgomery, Alabama. Due to a trial scheduling conflict, Attorney Wise was forced to withdraw as attorney of record for defendant.
3. On Thursday, February 16, 2006, undersigned counsel met defendant for the first time.
4. On Monday, February 20, 2006, defendant retained undersigned counsel to represent him in this cause.
5. This case is presently set for trial for the May term of Court. Undersigned counsel is prepared to clear his trial calendar and be ready for trial on that date.
6. In reviewing the indictment and extensive discovery provided thus far, it is undersigned counsel's belief that certain pretrial motions need to be filed on defendant's behalf in order for defendant to have effective assistance of counsel as guaranteed him by the Sixth Amendment to the United States Constitution.

7. Undersigned's counsel has been informed that the dead line for filing pretrial motions is February 21, 2006.
8. It is respectfully submitted that one day is not a sufficient amount of time for the preparation of pretrial motions deserving of this case.
9. Undersigned counsel submits that two weeks would be sufficient time in which to prepare pretrial motions on behalf of defendant.
10. Undersigned counsel has spoken to AUSA Louis V. Franklin, Sr. and he has no objection to the requested extension of time for filing of pretrial motions.

WHEREFORE, the undersigned prays this Honorable Court will grant him an additional two weeks in which to file pretrial motions in this cause.

Respectfully submitted,

s/T. Jefferson Deen, III
Post Office Box 2705
Mobile, AL 36652
(251) 433-5860

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all necessary parties .

s/T. Jefferson Deen, III